

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF FLORIDA  
PENSACOLA DIVISION**

PRESIDENT DONALD J. TRUMP,  
45th President of the United States of  
America, in his individual capacity,

Plaintiff,

v.

SIMON & SCHUSTER, INC., a New  
York corporation, ROBERT  
WOODWARD p.k.a. BOB  
WOODWARD, an individual, and  
PARAMOUNT GLOBAL, a Delaware  
corporation f/k/a VIACOMCBS, INC.,  
a Delaware corporation, f/k/a Viacom  
Inc., successor by merger to  
CBS Corporation, a Pennsylvania  
corporation f/k/a Westinghouse Electric  
Corporation,

Defendants.

Civil Action Number:  
3:23-cv-02333-MCR-ZCB

**MOTION FOR ADMISSION  
*PRO HAC VICE***

Pursuant to Local Rule 11.1(C), Defendant Bob Woodward moves for the admission *pro hac vice* of Kevin T. Baine, a licensed member of the District of Columbia Bar. Mr. Baine has undertaken the representation of Defendant Bob Woodward as Of Counsel. Davis Wright Tremaine LLP and Gunster, Yoakley & Stewart, P.A. remain as Counsel for all Defendants, including Woodward. In support of this motion, Defendant states as follows:

1. Kevin T. Baine resides in Washington, DC.

2. Mr. Baine is licensed to practice law in Washington, DC, New York, and Maryland, and is a member in good standing of the District of Columbia, New York, and Maryland Bars. A true and correct copy of Mr. Baine's Certificate of Good Standing from the District of Columbia Court of Appeals is attached hereto as Exhibit A.

3. Mr. Baine is a Senior Counsel at the law firm Williams & Connolly LLP, 680 Maine Avenue, SW, Washington, DC 20024.

4. Williams & Connolly LLP was retained by Defendant Bob Woodward to provide legal representation in connection with the above-captioned action before this Court. Should the Court grant this motion, Mr. Baine and Williams & Connolly LLP will represent Defendant Bob Woodward as Of Counsel in this case, with Davis Wright Tremaine, 1251 Avenue of the Americas, 21st Floor, New York, NY 10020, and Gunster, Yoakley & Stewart, P.A., One Independent Dr., Suite 2300, Jacksonville, FL 32202, remaining as Counsel to Mr. Woodward.

5. Mr. Baine is not a member of The Florida Bar and does not maintain any law office in Florida.

6. Mr. Baine studied and is familiar with the Local Rules of this District. He further certifies he successfully completed the Attorney Admission Tutorial for the Northern District of Florida and has reviewed the CM/ECF Attorney User's Guide. (Confirmation #: FLND1680396858327.)

7. Mr. Baine agrees to comply with the provisions of the Florida Rules of Professional Conduct, the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Federal Rules of Appellate Procedure, and the Local Rules of this Court and understands he shall be subject to the disciplinary jurisdiction of this Court.

8. Mr. Baine certifies that he has never been subject to any suspension or disbarment proceedings.

9. Mr. Baine has an active, upgraded PACER account. He requests authorization to receive electronic notices of filing. His email address is kbaine@wc.com.

10. Mr. Baine is paying the required \$208.00 *pro hac vice* fee for this case at the time of filing.

WHEREFORE, Defendant Bob Woodward respectfully requests that this Court enter an order granting this motion and permitting Mr. Baine to appear *pro hac vice* in this case.

Dated: April 3, 2023

/s/ Kevin T. Baine

Kevin T. Baine

District of Columbia Bar No. 238600

WILLIAMS & CONNOLLY LLP

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kbaine@wc.com

*Of Counsel for Defendant Bob Woodward*

### **CERTIFICATE OF SERVICE**

I hereby certify that on April 3, 2023, I electronically filed the forgoing with the Clerk of Court by using CM/ECF, which automatically serves all counsel of record for the parties who have appeared.

/s/ Kevin T. Baine

Kevin T. Baine

District of Columbia Bar No. 238600

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*Of Counsel for Defendant Bob Woodward*